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Attorney for Debtor(s)

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

IN RE:	§	
	§	CASE NO. 22-31960
ANTONIO MAURICE PEPPERS	§	
DENISE ALEXANDER PEPPERS	§	CHAPTER 7
Debtor(s).	§	
	§	
INFINITY ON THE OAKS f/k/a	§	
HIDDEN OAKS	§	
Movan	§	
V.	§	
ANTONIO MAURICE PEPPERS	§	Preliminary Hearing on Motion
DENISE ALEXANDER PEPPERS	§	for Relief from Automatic Stay:
Debtor-Respondent.	§	<b>February 28, 2023</b>

**DEBTOR'S ANSWER AND OBJECTION TO  
MOTION FOR RELIEF FROM AUTOMATIC STAY  
FILED BY INFINITY ON THE OAKS F/K/A HIDDEN OAKS**

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW ANTONIO AND DENISE ALEXANDER PEPPERS ("Debtor" whether singular or plural) and requests of the Court that a hearing be scheduled on the subject matter and files this Debtor's Answer and Objection to Motion for Relief from Automatic Stay Filed by Infinity on the Oaks f/k/a Hidden Oaks ("Movant"), and in support hereof would respectfully show the Court as follows:

**SPECIFIC ADMISSIONS**

1. Debtor admits the allegations contained in paragraph(s) 1, 2, 3, and 4 of Movant's Motion.

**SPECIFIC DENIALS**

2. Debtor denies the allegations contained in paragraph(s) 5, 6 and 7 of Movant's Motion and demands strict proof thereof.

**EFFECT OF QUALIFIED DENIAL OR LACK OF ADMISSION**

3. Debtor neither admits or denies the allegations contained in paragraph(s) 6 and 7 of Movant's Motion having insufficient information to do so, and therefore, denies same and demands strict proof thereof.

**ELEMENT OF DEBTOR'S DEFENSE**

4. There exists cause justifying the denial of Movant's Motion and requested action for the following reasons:

B. The property is necessary for the effective reorganization of the Debtor because it is the Debtor's residence.

C. Debtor would show that the subject property is adequately insured to the extent necessary, proper, and sufficient to protect Movant's interest in the collateral.

1. Debtor would show the Court that any default may be cured within a reasonable time.

**RIGHT TO AMEND OR SUPPLEMENT RESERVED**

5. Debtor reserves the right to amend or supplement this Answer with additional information supported by Debtor's evidence, affidavit and/or amended answer.

**PRAYER**

**WHEREFORE, PREMISES CONSIDERED,** Debtor prays that a hearing be set in the instant matter, that Movant's Motion be denied in all respects and that the automatic stay pursuant to §362 of the United States Bankruptcy Code remain in full force and effect, and for

such other and further relief to which the Debtor may show himself entitled.

Respectfully submitted,

/s/ Nicholas C. Inman

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**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing Debtor's Answer and Objection to Motion for Relief from Automatic Stay was served on each party listed below, by the means stated below, on February 2, 2023:

DEBTOR: FIRST CLASS MAIL  
Antonio and Denise Alexander Peppers  
9236 Church Road Apt. 1046  
Dallas, TX 75231

ATTORNEY FOR MOVANT: ELECTRONIC MAIL  
Brandy Alexander  
SBN: 24108421  
2502 La Branch St.  
Houston, Texas 77004

CHAPTER 7 TRUSTEE: ELECTRONIC MAIL  
Anne Elizabeth Burns  
900 Jackson Street, Ste. 570  
Dallas, Texas 75201

/s/ Nicholas C. Inman  
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NICHOLAS C. INMAN  
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